

LAW OFFICES OF IVETTE AMELBURU MANINGO
IVETTE AMELBURU MANINGO, ESQ.
NEVADA BAR NO.: 7076
400 S. Fourth Street, Ste. 500
Las Vegas, NV 89101
Tele.: (702) 793-4046
Fax: (844) 793-4046
Email: iamaningo@iamlawnv.com
Attorney for Defendant

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ENRIQUE MARTINEZ,

Defendant.

CASE NO.: 2:21-cr-0169-RFB-BNW

**DEFENDANT ENRIQUE MARTINEZ'S
UNOPPOSED REQUEST FOR
TRAVEL**

COMES NOW, Defendant, ENRIQUE MARTINEZ, and hereby respectfully requests this Honorable Court issue an Order granting Defendant leave to travel outside the State of Nevada to Arleta, California, on September 2, 2022 through September 5, 2022 for the purpose of seeing his mother who was recently hospitalized.

Mr. Martinez was granted leave by this Honorable Court (nunc pro tunc) to travel and care for his mother last weekend, on August 27, 2022 through August 28, 2022 (See Dkt. 63). However, because the dates had passed upon entry of this Court's Order, Mr. Martinez files this motion to modify the dates originally requested for leave to travel this coming holiday weekend instead.

To date, Mr. Martinez has been compliant with all terms of his supervised release. Mr. Martinez's elderly mother resides in California and was recently hospitalized. He would like to go and spend time with his mother and help her get adjusted after her stay in the hospital. If permitted, he will drive to California on September 2nd and will stay with his mother at 13688 Bracken Street, Arleta,

1 California 91331 for the duration of his trip. Mr. Martinez will return to Las Vegas on September 5,
2 2022, at the end of the holiday weekend.

3 The Defense has contacted both AUSA Kimberly Sokolich and Defendant's Pre-Trial
4 Services Officer Samira Barlow regarding the instant request. AUSA Sokolich advised she would
5 defer to Pre-Trial Services and Officer Barlow has no objection to this request. For these reasons,
6 Mr. Martinez respectfully requests the Court grant his Unopposed Motion for Travel to California
7 from the period of September 2, 2022 through September 5, 2022 for the purpose of seeing and
8 caring for his ill mother.
9

10 Dated this 30th day of August, 2022.

11 /s/ Ivette Amelburu Maningo
12 Ivette Amelburu Maningo, Esq.
13 400 S. 4th St. #500
14 Las Vegas, Nevada
Attorney for Defendant

15 **CERTIFICATE OF ELECTRONIC SERVICE**

16 The undersigned hereby certifies that on the 30th day of August, 2022 I served an electronic
17 copy of the above DEFENDANT ENRIQUE MARTINEZ'S UNOPPOSED REQUEST FOR
18 TRAVEL to all parties of record via CM/ECF.
19

20 /s/ Wildalia Coulsen
21 An Employee for
22 The Law Offices of Ivette Amelburu Maningo

23 **ORDER**

24 **IT IS SO ORDERED**

25 **DATED:** 10:42 am, August 31, 2022

26 

27 **BRENDA WEKSLER**
28 **UNITED STATES MAGISTRATE JUDGE**